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*Attorney for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALLSTATE INSURANCE COMPANY;  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY; ALLSTATE  
INDEMNITY COMPANY; and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

OBTEEN N. NASSIRI, an individual; and  
MED ED LABS, a Nevada nonprofit  
corporation,

Defendants.

CASE NO. 2:20-cv-00425-JCM-DJA

**STIPULATION AND ORDER  
FOR EXTENSION OF DEADLINE TO FILE REPLY TO PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTION TO DISMISS OR, IN THE ALTERNATIVE FOR SUMMARY  
JUDGMENT DUE TO EXPIRATION OF PRIOR JUDGMENTS [ECF 57]  
(FIRST REQUEST)**

By and through their respective counsel of record, Defendants OBTEEN N. NASSIRI and MED ED LABS and Plaintiffs ALLSTATE INSURANCE COMPANY, ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY, and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY hereby tender to the Court this Stipulation And Order For Extension Of Deadline To File Reply to Plaintiffs' Response to Defendants' Motion To Dismiss Or, In The Alternative, For Summary Judgment

1 Due To Expiration Of Prior Judgments (First Request). This Stipulation and Order pertain to  
2 Defendants' forthcoming reply to the following:

3 Plaintiffs' Response Defendants' Motion to Dismiss or, in the Alternative for  
4 Summary Judgment Due to Expiration of Prior Judgments [ECF 57]  
5 (filed June 15, 2020) (the "Response").

6 In this connection, Plaintiffs and Defendants (each a "Party" and collectively the "Parties")  
7 hereby stipulate and agree as follows:

8 1. Together with its exhibits, Plaintiffs' Response comprises around 200 pages.  
9 Defense counsel's professional schedule has been quite hectic. He is a solo practitioner.  
10 The limitations and impediments to work in light of continuing COVID restrictions have  
11 made it so that he and his staff have not been as efficient as usual.

12  
13 2. Since Plaintiffs filed their Response on June 15, 2020, Defendants' counsel has  
14 worked on and filed, among other things, an appellate brief in the Ninth Circuit Court of  
15 Appeals, which was unusually involved and time-consuming. He has also worked on  
16 other motions, oppositions, papers, and pleadings in other cases with pre-existing due  
17 dates and deadlines; he has worked on various discovery matters; he has worked on  
18 issues relating to the sales of commercial properties; and he has appeared for various  
19 meetings and hearings. For these reasons, he has not had time to work on an a reply to  
20 Plaintiffs' Response.  
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24 ///  
25 [THE REST OF THIS PAGE IS INTENTIONALLY LEFT BLANK]  
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3. For these reasons, Plaintiffs' counsel has graciously agreed to an extension for Defendants to file a reply. Defendants' deadline to file reply is currently 6/29/2020. There is no hearing date set at this time. The Parties hereby agree and stipulate to a 14-day extension of the deadline to 7/13/2020.

IT IS SO STIPULATED.

Dated: June 26, 2020

June 26, 2020

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**FORAN GLENNON**  
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By: /s./Dylan P. Todd  
DYLAN P. TODD, ESQ.  
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LEE H. GORLIN, ESQ.  
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*Attorneys for Plaintiffs*

**ORDER**

Having reviewed the foregoing Stipulation of the Parties, and finding good, just, and sufficient cause therefor, it is hereby entered as an Order of the Court.

IT IS SO ORDERED.

DATED: July 2, 2020

  
UNITED STATES DISTRICT JUDGE  
CASE NO. 2:20-cv-00425-JCM-DJA

***Submitted by:***

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